REMARKS

Claims 1-36 and 117-118 are pending. New claim 118 reads on the elected invention. Each of the examined claims is believed to define an invention that is novel and unobvious over the cited references. Favorable reconsideration of this case is respectfully requested.

In an exemplary embodiment of the invention, models may include element lists that comprise element chunks, for example, as defined in the present specification at page 12, line 28 – page 13, line 14. Further, a model may group related elements for any purpose relevant to an application (e.g., applications that store large quantities of variable size data). This strict hierarchy (model directory contains model, which contains element list, which contains element chunk, which contain element) may facilitate efficient loading and more importantly resaving of individual elements as it change size without the need to rewrite the entire model. The model header may contain the name and geometric information that may be relevant regarding the model without having to load the model into memory.

Referring to Figures 5-7 of the present application, for example, in an exemplary embodiment of the invention, each of the plurality of models 310 may comprise element list storages 311, 312 containing at least one element chunk 320. Each of the element chunks may comprise an element chunk header 325 and at least one element 330 that may be associated with its respective element chunk header 325. Within an element list storage, individual elements may be stored in groupings, or element chunks 320. Each element may be giving a unique name, for example, so that chunks may be determined merely by iterating over the names of the element list, please see the present specification, for example at page 13, lines 1-4.

Accordingly, the claims relate to a method of storing elements in a particular file format. As is known to one of ordinary skill in the art, a file when used in connection with computer systems is an entity of data available to users of the system that can be manipulated as an entity. For example, a file can be moved from computer to computer, directory to directory, transmitted over an network, etc. A file may be, for example, a Word document, which may be attached to an e-mail an transmitted over an network to a computer. Each of the pending claims relates to what is

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in the file and the format of the file. The claims have been amended to more specifically recite features of the present invention. For example, the elements are defined as variable sized data records. The element chunks are defined as being variable sized and having a unique name and a fixed header. The fixed header includes a number of elements in the element chunk, a compression scheme, or an encryption scheme for the elements. None of the cited references disclose, teach or suggest the features of the amended claims, as is discussed in more detail below.

Claims 1-2, 5-7, 10-12, 15-30, 33-36, 117 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Number 6,230,200 to Forecast et al. further in view of U.S. Patent Number 4,858,146 to Shebini.

Forecast et al. describe a method and system for allocating resources in a file server by dynamically modeling data handling components. Forecast et al. shows a class hierarchy 600. The class hierarchy 600 is arranged as an inverted tree structure. The class includes software and hardware component making up the file server. The class hierarchy is a way of specifying generic properties and characteristics of components included in a video file server. The components may include, for example, a disk array, a tape silo, please see column 57, lines 23-54 of Forecast et al. The class hierarchy of hardware and software components does not correspond to the claimed method for storing data in a file format. There is no mention in Forecast et al. of at least elements being variable size data records arranged in a format, a model including a model header stream including at least one of a model name, units, or a geometric range for the model.

Additionally, Forecast et al. make no mention of graphic elements having a physical representation and control elements having no physical representation stored in respective element lists. In Forecast et al. a stripe set 325 is prefetched from a RAID set 220 and stored in a cache 41. The data from the cache 41 of the disk array 23 is then streamed continuously to the client 54. A pointer 323 points to the current play position in the client's current clip 321. None of these features of Forecast et al. corresponds to a graphic element list including graphic elements and a control element list including control elements, please see column 34, lines 10-33 of Forecast et al.

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Shebini et al. do not supplement Forecast et al. to teach or suggest the claimed invention. Shebini make no mention of elements being variable sized data records arranged in a format, a model including a model header stream, a graphic element list and a control element list. Additionally, Shebini makes no mention of an element chunk being allocated to one of the element control list and the graphic element list, the element chucks being variable sized and having a unique name and a fixed header including at least one of a number of elements in the element chunk, a compression scheme, or an encryption scheme for the elements.

In view of the above, it is respectfully submitted that the cited references do not fairly teach or suggest the claimed invention. Therefore, the withdrawal of this rejection is respectfully requested.

Claims 3-4, 8-9, 13-14, and 31-32 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Forecast et al., Shebini and further in view of U.S. Patent Number 6,948,070 to Ginter et al.

Ginter et al. do not supplement Forecast et al. and Shebini to teach or suggest the claimed invention. Claims 3-4, 8-9, 13-14 and 31-32 depend directly or indirectly from independent claims 1 and 19 and would patentable for at least the reasons discussed above regarding those claims. Ginter et al. is cited as teaching encrypting compression/decompression engine. Therefore, withdrawal of this rejection is respectfully requested.

In view of the above, it is respectfully submitted that all pending claims are now in allowable form. Early issuance of a Notice of Allowance is respectfully solicited.

If the Examiner is of the opinion that the prosecution of this application would be advanced by a personal interview, the Examiner is invited to telephone undersigned counsel to arranged for such an interview.

The Commissioner is authorized to charge any fee necessitated by this Amendment to our Deposit Account No. 22-0261.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

By_____
Jeffri A. Kaminski
   Registration No.: 42,709
James R. Burdett
   Registration No.: 31,594
VENABLE LLP
P.O. Box 34385
Washington, DC 20043-9998
(202) 344-4000
(202) 344-8300 (Fax)
Attorney/Agent For Applicant